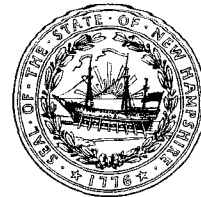




The State of New Hampshire
Department of Environmental Services



Michael P. Nolin
Commissioner

September 20, 2006

Mr. George P. Downing
Vice President of Operations
Elektrisola Incorporated
126 High Street
Boscawen, New Hampshire 03303

**CERTIFIED MAIL (7005 1160 0004 7468 0045)
RETURN RECEIPT REQUESTED**

**LETTER OF DEFICIENCY
No. ARD 06-024
(Sta.S.)**

Dear Mr. Downing:

On July 12, 2006, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted a review of its files on Elektrisola Incorporated's ("Elektrisola") facility in Boscawen to determine compliance with Elektrisola's Title V Operating Permit TV-OP-037 ("the Permit"), issued on September 25, 2001, and the N.H. Administrative Rules Env-A 100 *et seq.*, NH Rules Governing the Control of Air Pollution.

As a result of the file review, this Letter of Deficiency ("LOD") is being sent to identify the following deficiencies:

1. Env-A 908.03, *VOC Reporting Requirements*, and Item 4, Table 8 of the Permit, require Elektrisola to annually report to DES the number of gallons of each coating, including solvents and diluents, utilized during a typical ozone season day of each surface coating operation. Elektrisola has not submitted this information for the calendar years reviewed, 2002 through 2005.
2. Item 7, Table 8 of the Permit requires Elektrisola to annually report to DES a 12-month rolling total of phenol emissions from the S-45 coating machines. In Elektrisola's 2005 Annual Compliance Certification Report, Elektrisola stated that the calendar year 2004 monthly coating usage records were incorrect and therefore the calendar year 2005 12-month rolling totals were estimated. To date, Elektrisola has not submitted corrected phenol data for 2004 and 2005.
3. Item 3, Table 6 of the Permit requires Elektrisola to conduct monthly catalyst testing on all the main stacks through which the coating machines exhaust using a flame ionization detector. When the exhaust emissions, calibrated to propane, show volatile organic concentration ("VOC") above 35 parts per million by volume ("ppmv") on a wet basis, Elektrisola is required to test each coating machine that exhausts through that particular stack and replace the catalyst accordingly. Based on information in the Jan-June 2006 Semi-Annual Permit Deviation and Monitoring ("SA PD/M") report submitted by Elektrisola, an exceedance of the 35 ppmv action level was detected in Stack 59 on April 28, 2006, however, individual coating machines exhausting through stack 59 were not tested to determine the cause of the exceedance. Elektrisola tested the individual machines on May 17, 2006 when a subsequent exceedance of the 35 ppmv action level was discovered. Elektrisola did not report this permit deviation to DES until it reported its SA PD/M report on July 28, 2006.

4. Item 3, Table 6 of the Permit also requires Elektrisola to record the enamel and wax usage rates for each coating machine tested during the monthly and annual catalyst testing. In the SA PD/M report for calendar years 2002 through 2004, Elektrisola did not record the enamel and wax usage rates for approximately half of its machine. In SA PD/M for calendar year 2005, Elektrisola did not record the wax usage rates for four of its wire coating machines.

DES believes that Elektrisola can resolve the above referenced deficiencies by taking the following actions:

- i. **In the calendar year 2006 Annual Emissions Report required by DES on or before April 15, 2007**, Elektrisola shall include the number of gallons of each coating, including solvents and diluents, utilized during typical ozone season day for each surface coating operation.
- ii. **By October 30, 2006**, Elektrisola shall submit to DES the corrected 12-month rolling totals of phenol emissions from the S-45 coating machines for calendar years 2004 and 2005.
- iii. **Immediately and until a new permit is issued**, Elektrisola shall test each coating machine connected to an exhaust point that demonstrates an exceedence of 35 ppmv VOC during the monthly catalyst testing. In addition, Elektrisola must promptly review monthly FID testing and initiate catalyst replacement, as necessary, as soon as practically possible.
- iv. **Immediately and until a new permit is issued**, record the enamel and wax usage rates for each coating machine tested during the monthly and annual catalyst testing. In addition, **by October 30, 2006**, Elektrisola shall provide monthly enamel and wax usage rates to DES to confirm the emissions calculations reported in the calendar year 2005 Annual Emission Report.

In the event compliance is not achieved within the time periods indicated, DES may initiate formal action against Elektrisola, including issuing an order requiring the deficiency to be corrected, and/or referring this matter to the NH Department of Justice.

Please address all information to Barbara Hoffman, at the following address:

NHDES Air Resources Division
Enforcement Section
29 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095

Please be advised that DES will continue to monitor the compliance status of Elektrisola and that this letter does not provide relief against any other existing or future violations. It is important that Elektrisola be aware of all applicable regulations and the requirements of its permit, and that Elektrisola keep records necessary to submit compliant annual emissions reports in the future.

If you have questions regarding compliance with Env-A 100 et seq. or require further information, please contact Barbara Hoffman at (603) 271-7874, Air Resources Division, Compliance Bureau. A current copy of the Air Resource Division rules can be obtained from the DES website at <http://www.des.nh.gov/rules/air.htm> or by contacting the Public Information Center at (603) 271-2975.

Sincerely,

A handwritten signature in black ink is written over the word "COPY", which is printed in large, bold, capital letters. The signature appears to be "P. Monroe".

Pamela G. Monroe
Compliance Bureau Administrator
Air Resources Division

PGM/blh

cc: R. Kurowski, EPA Region 1
G. Hamel, DES Legal Unit Administrator
Edward Maloof, Chair, Boscawen Board of Selectmen
AFS # 3301300111